

May 11, 2005

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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Federal Communications Commission
Office of Secretary

Re: WT Docket No. 02-353, Service Rules for Advanced Wireless Services in
the 1.7 and 2.1 GHz Bands
Ex Parte

Dear Ms. Dortch:

On May 10, 2005 David Wye and Neeti Tandon of Cingular Wireless met with members of the Wireless Telecommunications Bureau to discuss issues related to the possible revision of the band plan for Advanced Wireless Services. Bureau staff attending were: Peter Corea, Marty Liebman, Blaise Scinto, John Spencer, Jennifer Tomchin, Peter Trachtenberg, Steve Zak, and Mindy Littell (by telephone).

Cingular representatives expressed the following views:

- Cingular supports the retention of the A-C blocks as described in the Commission's Report and Order, released November 25, 2003.
- Cingular could support the conversion of the D block into a 20 MHz license by taking 10 MHz of spectrum from the E block, and retaining the RSA/MSA designation as proposed by T-Mobile USA, Inc. and the Rural Telecommunications Group (RTG) in their Joint Proposal filed March 11, 2005 (Joint Proposal).
- Cingular does not support using the remainder of the original E block to create two 10 MHz (2x5 MHz) licenses, E and F as also described in the Joint Proposal. The block should be left as a 20 MHz block (2x10 MHz) and licensed on a REAG basis as the Commission originally proposed, or, alternatively, converted to an EA basis.

Cingular stated its view that 2x5 MHz licenses will lead to inefficient use of the spectrum and to increased interference, and that 2x10 MHz licenses are the minimum needed to effectively support today's technologies while avoiding interference from adjacent bands. As part of its technical discussion, Cingular representatives made reference to *Radio Network Planning and Optimisation for UMTS*, Chapter 5, section 4, Jaana Laiho, Achim

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Wacker, Tomas Novosad, eds. (West Sussex, England: John Wiley & Sons, Ltd), 2002.
Cingular also believes that the current direction of technology development to support higher bandwidth applications and advanced technologies requires wider channel bandwidths, not the narrow bandwidths that would be the result of the Joint Proposal.

Finally, Cingular noted that, due to the location of the E and F blocks at the top of the bands, and considering the geographic designations proposed in the Joint Proposal, it would be difficult to aggregate them with other, non-contiguous blocks in the AWS bands.

Please associate this notification with the referenced docket proceeding. If there are any questions concerning this matter, please contact the undersigned.

Sincerely,



David Wye
Executive Director, Federal Regulatory Affairs

cc: Peter Corea
Marty Liebman
Blaise Scinto
John Spencer
Jennifer Tomchin
Peter Trachtenberg
Steve Zak
Mindy Littell